

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OKLAHOMA

NANCY R., pseudonymously,

Plaintiff,

vs.

PLAZA HOTELS LLC, et al.,

Defendants.

Case No.: 5:25-cv-00462-G

**PLAINTIFF'S MOTION FOR *PRO HAC VICE* ADMISSION
OF GEOFFREY C. PARKER**

Plaintiff, Nancy R., by her undersigned attorney in the above-captioned matter respectfully moves the Court to admit non-resident attorney Geoffrey C. Parker, *pro hac vice*, to appear in and participate as counsel or co-counsel in this case with Fletcher D. Handley, Jr., OBA No. 3797 with the law firm of Handley Fletcher Center. In support of this Motion, Plaintiff Nancy R. states as follows:

1. Geoffrey C. Parker is an attorney with Hilton Parker LLC located at 7658 Slate Ridge Boulevard, Reynoldsburg, OH 43068.
2. The undersigned, Fletcher D. Handley, Jr., certifies that Geoffrey C. Parker is a member of the bar in good standing of the highest court of the State of Ohio and Nevada. Geoffrey C. Parker has not been disciplined in any jurisdiction and has not resigned or been placed on inactive status as a member of any bar.
3. Attached to this Motion is a Request for Admission *Pro Hac Vice*, completed and signed by Geoffrey C. Parker.
4. Geoffrey C. Parker understands that he must register for electronic filing (ECF) with this Court promptly upon granting this Motion and upon activation,

electronically file an Entry of Appearance consistent with LCvR 83.4.

5. A Proposed Order granting this Motion is submitted herewith.

6. This Motion is accompanied by the required \$100.00 fee.

WHEREFORE, Plaintiff Nancy R. respectfully requests the Court grant this Motion and enter an Order in the form attached admitting Geoffrey C. Parker *pro hac vice* to represent Plaintiff in this case and in all proceedings attendant thereto.

Dated, May 20th, 2025.

/s/ Fletcher D. Handley, Jr.
FLETCHER D. HANDLEY, JR.
OBA No. 3797
Handley Law Center
PO Box 310
El Reno, OK 73036
Tel: (405) 295-1924
Email: fdh@handleylaw.com

Attorney for Plaintiff Nancy R.

Certificate of Service

The undersign certifies that on the 20th day of May, 2025 he electronically transmitted a true and correct copy of the within and foregoing to all parties' counsel as outlined further below, in accordance with the Federal Rules of Civil Procedure:

<p>Abby R. Herren Bart Jay Robey Eric A. Moen CHUBBUCK DUNCAN & ROBEY, PC 1329 Classen Drive Oklahoma City, OK 73103 <i>Attorney for Defendant,</i> <i>OKC Airport ES, LLC</i></p>	<p>David Senger Hunter Siex COFFEY, SENGER & WOODARD, PLLC 4725 East 91st Street, Suite 100 Tulsa, Oklahoma 74137 <i>Attorneys for Defendant,</i> <i>Jaliyan Hospitality, Inc.</i></p>
<p>Charles D Neal , Jr Steidley & Neal-MCALESTER P O Box 1165 100 E Carl Albert Parkway McAlester, OK 74502</p> <p>Jamie A Rogers Philard L Rounds , Jr Steidley & Neal, PLLC - Tulsa 2448 E 81st 53rd Floor Ste 5300 Tulsa, OK 74137</p> <p>Christopher T. Byrd Patrick B. Moore Shubhra R. Mashelkar WEINBERG, WHEELER, HUDGINS, GUNN & DIAL 3344 Peachtree Road. NE, Suite 2400 Atlanta, Georgia 30326 <i>Attorneys for Defendant,</i> <i>ESH Strategies Franchise, LLC</i></p>	<p>Kaylee P. Davis-Maddy Michael S. Linscott DOERNER SANDERS DANIEL & ANDERSON 210 Park Avenue, Suite 1200 Oklahoma City, OK 73102 <i>Attorneys for Defendants,</i> <i>Super 8 Worldwide LLC,</i> <i>Days Inn Worldwide, Inc.,</i> <i>Ramada Worldwide, Inc.</i> <i>Howard Johnson International, Inc.</i></p>
<p>Alexander Gebert Robert Glenn Chadwick, Jr. FREEMAN MATHIS & GARY, LLP 7160 Dallas Parkway, Suite 625 Plano, Texas 75024 <i>Attorneys for Defendant,</i> <i>Raj Krupa Hotel, LLC</i></p>	<p>Jonathan Wilfong Oyo Hotels, Inc. 440 Louisiana Street, Suite 105 Houston, TX 770062 <i>Attorney for Defendant,</i> <i>G6 Hospitality Franchising, LLC</i></p>

Steve Ketter 5101 S. Choctaw Avenue El Reno, OK 73036	Kajal Hospitality, LLC c/o Jaydip Modi 1120 S. 10th Street Clinton, OK 73601
Chand & Saaj Hospitality, Inc. c/o Hitesh Patel 2200 S. Meridian Oklahoma City, OK 73108	Noor Hotel, LLC c/o Abdel Jawabreh 3213 Meadow Lane Edmond, OK 73103
Yash Enterprises, Inc. c/o Tushar Natha 400 S. Meridian Oklahoma City, OK 73108	Ambica, LLC c/o Prakash Patel 5608 N.W. 107 th Street Oklahoma City, OK 73162
OM, LLC c/o Ramesh V. Patel 12001 N. I-35 Service Road Oklahoma City, OK 73131	Indra, LLC c/o Ramesh Patel 11935 N. I-35 Service Road Oklahoma City, OK 73131
Plaza Hotels, LLC 3200 S. I-35 Service Road Oklahoma City, OK 73129	Michael Wiley 11025 N. County Line Road Yukon, OK 73099

/s/ Fletcher D. Handley, Jr.

Fletcher D. Handley, Jr.



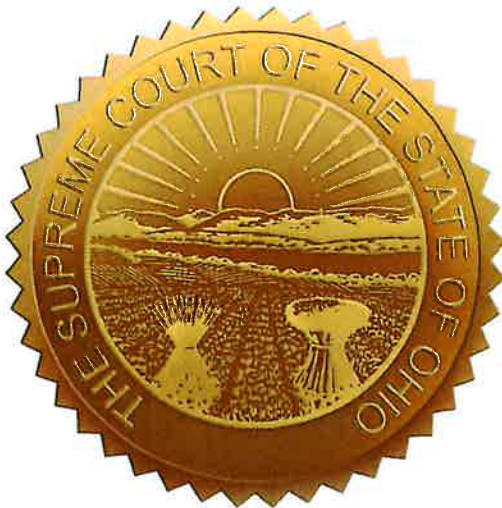
THE SUPREME COURT *of* OHIO

CERTIFICATE OF GOOD STANDING

I, MICHEL JENDRETZKY, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Geoffrey Craig Parker
Attorney Registration No. **0096049**

was admitted to the practice of law in Ohio on November 7, 2016; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.



IN TESTIMONY WHEREOF, I have
subscribed my name and affixed the seal of
the Supreme Court, this 25th day of March,
2025.

MICHEL JENDRETZKY
Director, Attorney Services Division

Shannon B. Scheid
*Shannon Scheid, Administrative Assistant
Office of Attorney Services*



No. 2025-03-25-1

Verify by email at GoodStandingRequests@sc.ohio.gov

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PROPOSED ORDER

Plaintiff, Nancy R., moves to admit Geoffrey C. Parker *pro hac vice*. See Doc. ___. For good cause shown, the Court GRANTS this motion. Geoffrey C. Parker is admitted to practice before this Court for the limited purpose of participating in this case, provided that Parker link his individual PACER accounts to this Court in order to request e-filing access and then electronically file his entries of appearance, consistent with LCvR83.4. The attorney should familiarize himself with this District's Local Rules and this Court's Chamber Rules.

IT IS SO ORDERED this ___ day of May, 2025.

X

Charles Goodwin
United States District Judge